

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

Nelson L. Bruce, South Carolina Department  
of Consumer Affairs,

Plaintiff,

v.

Case No. 2:21-cv-03603-BHH-MGB

Equifax Information Solutions, LLC  
("Equifax"), Experian Information Solutions,  
Inc. ("Experian"), TransUnion LLC,  
UNKNOWN DOE'S 1-100, et al.,

Defendants.

**DEFENDANT EQUIFAX INFORMATION  
SERVICES, LLC'S ANSWERS TO LOCAL  
RULE 26.01 INTERROGATORIES**

Equifax Information Services, LLC., the Defendant herein, files its Answers to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:** Equifax is not aware of any persons or legal entities with subrogation interests.

B. As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER:** Equifax does not demand a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned

company in which the party owns ten percent or more of the outstanding shares.

**ANSWER:** Equifax Inc. is a publicly traded company on the NYSE. It has no parent corporation or other corporation owning more than 10% of its stock.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER:** Equifax does not challenge the appropriateness of the division.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER:** Equifax is unaware of any related matter filed in this District.

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER:** Equifax is improperly identified as Equifax Information Solutions, LLC, rather than Equifax Information Services, LLC. Counsel for Equifax will accept service of an amended summons and pleading reflecting the correct identification.

G. If you contend that some other person or legal entity is, in whole or in part, liable

to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER:** While Equifax does not make such a contention at this time, it reserves the right to supplement its response after conducting discovery.

Respectfully submitted this 3rd day of January 2022.

*s/Rita Bolt Barker*

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Rita Bolt Barker (D.S.C. I.D. No. 10566)

WYCHE, P.A.

200 East Broad Street, Suite 400

Greenville, SC 29601

Tel. No.: 864-242-8200

Fax No.: 864-235-8900

E-Mail: [rbarker@wyche.com](mailto:rbarker@wyche.com)

*Attorney for Defendant*

*Equifax Information Services, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that on this 3rd day of January, 2022, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system and served same by depositing a copy into the U.S. Mail with appropriate postage affixed to the following:

Nelson L. Bruce (*pro se*)  
P.O. Box 3345  
Summerville, South Carolina 29484

*/s/ Rita Bolt Barker*

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Rita Bolt Barker

***Counsel for Defendant***

***Equifax Information Services LLC***